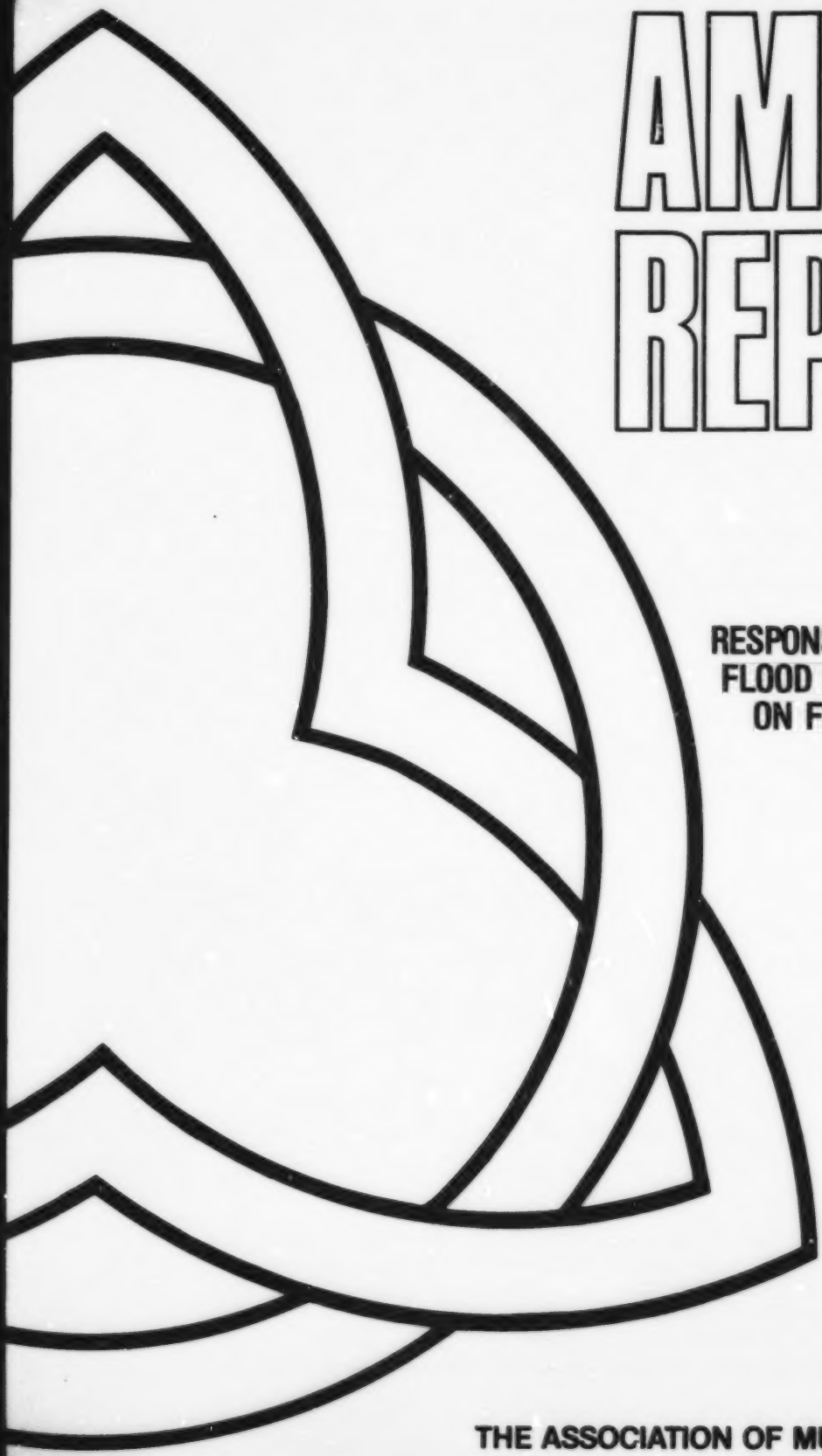

AMO REPORTS 84-6

RESPONSE TO THE REPORT OF THE FLOOD PLAIN REVIEW COMMITTEE ON FLOOD PLAIN MANAGEMENT IN ONTARIO

THE ASSOCIATION OF MUNICIPALITIES OF ONTARIO
AUGUST 1984

86-02228/

ASSOCIATION OF MUNICIPALITIES OF ONTARIO

The Association of Municipalities of Ontario, a non-partisan voluntary organization, is united to promote the values of the municipal government system and the status of the municipal level of government as a vital and essential component of the total intergovernmental framework of Ontario and Canada.

The Association acts as the collective voice of Ontario's municipal governments and is organized to accomplish through cooperation and coordination, what the majority have neither the time nor the resources to do individually.

The Association represents some six hundred (600) municipal governments throughout Ontario. The governing body is composed of some eighty (80) municipal elected and appointed officials, who in turn represent a wide-range of municipal government interest.

The following sections and affiliated municipal professional associations form an important part of the Association's structure and therefore, play an important part in its activities in terms of the Board of Directors, program and policy development:

Association Sections:

* County and Regional Section
* Large Urban Section
* Northern Ontario Section (FONOM/NOMA)
* Rural (ROMA) Section
* Organization of Small Urban Municipalities Section

Association Affiliates:

* Association of Municipal Clerks and Treasurers of Ontario
* Association of Municipal Tax Collectors of Ontario
* Municipal Engineers Association
* Ontario Municipal Administrators Association
* Ontario Municipal Personnel Association
* Ontario Municipal Social Services Association
* Society of Directors of Municipal Recreation of Ontario

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AMO RESPONSE TO THE REPORT OF THE FLOOD PLAIN REVIEW COMMITTEE ON FLOOD PLAIN MANAGEMENT IN ONTARIO

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AMO RESPONSE TO THE REPORT OF THE FLOOD PLAIN REVIEW COMMITTEE ON FLOOD PLAIN MANAGEMENT IN ONTARIO

1. Introduction

In August 1980, the Association of Municipalities of Ontario issued AMO Reports 37: Flood Plain Management Policies. This report urged a stronger role for municipalities in the regulation of land use activities within the flood plain.

In September 1982, the Minister of Natural Resources and the Minister of Municipal Affairs and Housing issued jointly a six-point Cabinet-approved policy on flood plain management. The Association was in the process of reviewing this policy and the accompanying implementation guideline when, in June 1983, the Minister of Natural Resources announced his intention to hold a series of public meetings throughout the Province to obtain public comment on the existing policies.

In November 1983, the Association issued AMO Reports 83-16: Provincial Flood Plain Policies: The AMO Perspective. This report presented 23 recommendations to the Minister of Natural Resources which the Association believed would improve the management of flood plain lands and make the land use process within the flood plain more accessible and more accountable to the general public.

In April 1984, the Association received the report of the Taylor Committee, which had been prepared after 15 public meetings, held across the Province, and the review of almost 300 written submissions. The following report will provide AMO's reaction to recommendations made by the Taylor Committee.

The Association has identified the following excerpt from the Taylor Committee Report as the basic principle of the report:

> "The present flood plain policies and their implementation, establish land use development controls of far more critical nature than do municipal land use planning regulations. The designation of Official Plans and the zones defined by Zoning By-laws are all expected to change over time. The 'no development' and 'conditional development' definitions of the present Flood Plain policies can be changed only with the greatest of difficulty. The Committee views this as a liability. Land use planning within a watershed should and must be guided by one process.

> Restrictions as ominous as the flood plain criteria currently overshadow the municipal land use planning process to the confusion and consternation of the public at large."[1]

The Association supports this principle.

The Association supports the adoption of a Provincial policy on flood plain management. The implementation of this policy as it pertains to the designation and regulation of land uses must rest with municipal council and must provide the flexibility to address local situations.

2. AMO Response to the Taylor Committee Recommendations

This section of AMO's response will address, in turn, each of the recommendations in the report of the Flood Plain Review Committee.

Recommendation #1

> **1. The Committee recommends that the Regulatory Flood used to designate Flood Plains in Ontario be the 100-Year Flood and will be defined by the water elevation having a return period of 100 years.**

The Association supports the adoption of a single flood criteria to be applied across Ontario to establish a measure of flood risk for each watershed based on the 100-year flood as defined by the water elevation with a return period of 100 years. The Association believes that the terminology used to describe the "regulatory flood" must be clearly defined to eliminate any misunderstanding or confusion related to the probability of the event and the extent of the flooding that would likely occur given that event.

In the case of municipalities that have adopted policies within their official plan related to flood plains and these policies are based on a regulatory criteria greater than the 100-year flood, the Association believes that these policies should remain in effect until the official plan is amended by municipal council.

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1 Report of the Flood plain Review Committee on Flood Plain Management in Ontario; February, 1984; Page 3-18

Therefore AMO recommends:

I That the Provincial Government adopt the 100-year flood as the base criteria for the designation of flood plains and for the adoption of official plan policies related to land use within the flood plain.

II That official plans policies based on a flood plain criteria higher than the 100-year flood remain in effect until amended by the municipal council.

Recommendation #2

2. The Committee recommends that consideration be given to permitting the maintenance of a higher criteria, where already adopted, subject to a full public review and referral of this criteria to an appropriate hearing tribunal.

The Association concurs with the principle of providing the option to adopt a higher regulatory flood level provided such an action is subject to public review and there is an opportunity for appeal.

The Association believes that the option described above should not be limited to watersheds that have "already adopted" a criteria that is higher than the 100-year flood. This option should be available to all watersheds provided a public review and appeal process is maintained.

With respect to the implementation of this recommendation, the Taylor Committee has failed to clearly identify the basic criteria for making such a change. The Association would support a system whereby such changes would be considered on a watershed basis, with a requirement that there be an opportunity for public input, and that an appeal process be established, similar to that which exists in the Planning Act, 1983.

The Taylor Report gives no indication of any details concerning the process involved or the body that would be responsible for hearings associated with adopting such higher flood levels. The Association would reserve comment on this aspect of the report pending the acceptance, by the Provincial Government, of the concept and an indication of what it would propose in this regard.

Therefore, AMO recommends:

III That the option of adopting a flood criteria higher than the 100-year flood be provided, on a watershed basis, to all watersheds within Ontario.

IV That any proposal to adopt a criteria higher than that established by the Provincial Government be open to public review and subject to an appeal process.

V That the Provincial Government be responsible for establishing a body and a process for the purpose of hearing appeals in this regard and that AMO be provided with an opportunity to review and comment on any such proposals before they are finalized.

For the purposes of this report the Association would define the term "watershed" as referring to those areas presently under the jurisdiction of a conservation authority, or, where no conservation authority exists, an area defined by the Minister of Natural Resources as being a watershed. The Provincial policy should define the meaning of the term "watershed" within the context of the Provincial Government flood plain policy.

Recommendation #3

3. The Committee recommends that all development within the flood plain be permitted anywhere within the flood plain subject to development being controlled both from structural integrity during a flood as well as for the potential to decrease channel capacity or channel storage. The flood plain shall include all land below the water elevations of the regulatory flood.

AMO disagrees with the principle being espounded by the Flood Plain Review Committee, that is, to allow development to occur anywhere within the flood plain provided certain conditions are satisfied. The Association continues in its belief that the official plan and the official plan process as provided in the Planning Act, 1983 should be the determining factors with respect to the designation of where development should occur and what type of development should be permitted within the municipality. The regulation of any such development would then be subject to official plan policies, zoning by-law provisions, site plan control agreements, the provisions of the Building Code and/or fill and construction regulations. With the exception of the Building Code and the fill and construction regulations, all other regulatory mechanisms noted above are subject to some form of appeal. The Association has in the past stressed the need for the conservation authorities' regulations to be subject to such an appeal mechanism and it continues in its belief of the need for such a change.

The assuring of structural integrity, the Association believes, should be the responsibility of the individual designing a structure located within a flood plain. As such, all construction within the flood plain should require a statement indicating that the proposed design of a building would maintain structural integrity given the flows anticipated in the event of the regulatory flood, be that the 100-year floor or a higher flood.

The maintenance of channel storage capacity would relate to situations where development may be proposed within the river channel, defined as that area within the upper limits of the identifiable "river banks", or where alteration of the waterway was anticipated. The Association agrees that the channel storage capacity available at the time the flood levels are established should be maintained.

Therefore, AMO recommends:

VI That the official plan and the official plan process be the mechanisms utilized the determine land use within the flood plain.

VII That fill and construction regulations be subject to public review and appeal.

VIII That all new buildings or structures within the flood plain be required to be designed so as to maintain their structural integrity in the event of a flood with flows up to and including those anticipated during the regulatory flood.

Recommendation #4

4. Structures below the high water elevation will be designed to be structurally stable and to provide a safe refuge from water flows at the control elevation.

This recommendation recognizes that the rate of flow of flood waters may vary within the flood plain and affect the ability to ensure structural stability and safety. The Association supports this recognition of varying flow velocities within the flood plain.

With respect to the provision of a "safe refuge", the Association reserves the right to comment further in this regard if and when the Province seeks to define this term in more detail. It is anticipated that provisions relative to floodproofing and/or the location of habitable rooms within buildings located in the flood plain may be forthcoming.

Recommendation #5

5. The Committee recommends that the analyses of the flood plain include the definition of the floodway required for the passage of flood waters associated with the 100-year flood.

This recommendation again recognizes that the 100-year flood may generate different flows within the defined flood plain depending on the topography, the degree of development within the flood plain, and other factors unique to any given situation. This in turn may affect the area that could be developed safely and economically. As such, there is a direct relationship between this recommendation and recommendation #3. The Association stresses that recommendation #3 must be a "permissive" policy that would be implemented through the appropriate municipal planning documents. This recommendation suggests that the area of high velocity flow be distinguished from those areas that may be subject only to standing water or very slow-moving water, therefore distinguishing between areas with differing levels of risk. The Association is supportive of this concept.

Recommendation #6

6. The Committee recommends that a freeboard be established in the definition of the Regulatory Flood level subject to further research being carried out.

The Association believes that it is of utmost importance that the Ministry of Natural Resources develop accurate methods of measuring flood levels and implement these methods as early as possible. Until such time as this occurs AMO would stress the need for the use of a common sense approach in the application of the freeboard provision so as not to unduly restrict development possibilities within the municipality.

Recommendation #7

7. The Committee recommends that the Two-Zone concept be abandoned in favour of an approach whereby all areas within the flood plain as defined by the Regulatory Flood would be considered as a conditional development area.

Recommendation #8

8. The Committee recommends that further use of Special Policy Area designation be deferred until the implications of the new Regulatory Flood and the recommendations on conditional development can be assessed.

The Association would reiterate the comments it made under recommendation #3 of the Flood Plain Review Committee, that is, that land use decisions within the municipality should not be mandated by the Provincial Government, but should be made by municipal council through the official plan process.

With respect to "special policy areas", those that have been adopted and are being implemented must continue to apply subject to any official plan amendment that may be proposed.

Recommendation #9

9. The Committee recommends that the primary responsibility for the implementation of flood plain management policies will be through the local municipalities under the new Planning Act.

Recommendation #10

10. The Committee recommends that the necessary modifications be made to the Conservation Authorities Act and other relevant legislation to effect the transfer of responsibility for the implementaiton of flood plain management policies from the Conservation Authorities to the local government.

Recommendation #11

11. The Committee recommends that consideration be given to amending the Conservation Authorities Act, to alter the powers of Conservation Authorities so that these bodies become advisors to participating local municipalities in the administration of the watershed.

The Association concurs with the principle of municipalities being responsible for the determination and implementation of flood plain management policies as they relate to the use of land within the flood plain and the determination of the necessary land use provisions to provide for this implementation. Municipalities would use the official plan to designate where and what development would be permitted and official plan policies, zoning by-laws and site plan control to regulate development within the flood plain. The authority available to municipalities under site plan control would have to be expanded to permit municipalities to address flood control and/or flood damage reduction measures. The Association has recommend-

ed such a move in past AMO submissions on flood plain policies. Whatever mechanism(s) municipalities choose to employ, the public must be provided with opportunities to review and appeal the measures used.

The present Provincial Government flood plain policies provide for the transfer of flood plain management responsibilities from conservation authorities to municipalities provided the appropriate official plan and zoning by-law provisions are put in place. The Taylor Committee recommendations would transfer responsibility for land use matters within the flood plain to municipalities while maintaining conservation authorities as advisors. This would in effect create a "single window" approach for the approvals required for development anywhere in the community.

The Association supports this transfer of responsibility for flood plain land use matters provided the following steps are incorporated into the process:

- that conservation authorities be provided with the opportunity to review and appeal any regulatory provisions imposed by the municipality

- that municipalities be provided with the option of delegating to conservation authorities the responsibility for implementing the land use policies of the municipality within the flood plain.

Further, with regard to the advisory role of conservation authorities relative to watershed administration, the Association believes that this advisory role is appropriate and required relative to the implementation of land use policies within the flood plain. With respect to other aspects of "watershed administration" or management, such as flood control, water quality, recreation, habitat preservation and other water- and conservation-related activities, the Association believes that these should remain the responsibility of conservation authorities.

Therefore AMO recommends:

IX That municipalities be responsible for the implementation of flood plain management policies as they relate to the use of land within the flood plain.

X That municipalities be authorized to delegate the responsibility for implementing municipal land use policies within the flood plain to the appropriate conservation authority if they choose to do so.

XI In instances where the municipality retains the responsibility for the implementation of land use policies within the flood plain, the municipality's levy to the conservation authority should be reduced accordingly and any grants related to these activities should be awarded to the municipality.

Recommendation #12

12. The Committee recommends that municipal Official Plans include policies in accordance with the appropriate section of the new Planning Act to the effect that site plan control provisions will be extended to embrace those areas defined by the elevational line of the Regulatory Flood. Amendment may also have to be made to the existing legislation.

Recommendation #13

13. The Committee recommends that policies be incorporated in the Municipal Official Plan which extend site plan control to include lands currently designated by fill and construction regulations.

Both recommendation 12 and 13 recommend that municipal official plans designate the area within the flood plain as an area that may be subject to site plan control. The recommendations suggest that this action be mandatory. The Association believes that such decisions are local in nature and should be made by the local municipality, and not mandated by the Provincial Government. Further, the designation of an area in the official plan as a possible site plan control area is merely a statement of intent. The Planning Act, 1983 recognizes an approved site plan control by-law as the operational document providing municipalities with the authority to require drawings and specifications for a proposed development and enter into agreements with the owner of the property. As such, the mandating of official plan policies in this regard would have only minimal impact. Also, there is nothing in the present Act to prevent municipalities from passing such plans and by-laws to include flood plains within site plan control areas.

Recommendation #13 suggests that site plan control could be utilized to implement the provisions of fill and construction regulations. The Association believes that changes would be required to the site plan control provisions of the Planning Act, 1983 to make this possible. The Association also believes that changes are required to the site plan control authority

that would permit the municipality to control the type of openings in structures, and require storm water retention and other flood damage reduction measures. The Association requests that it be consulted regarding these changes prior to their introduction in the Legislature.

Therefore, AMO recommends:

XII That the use of site plan control in flood plains not be mandatory.

XIII That the Association be consulted with respect to any changes to the Planning Act, 1983, relative to the use of site plan control in the flood plain, prior to the introduction of such changes in the Legislature.

The Association continues in its belief that changes to the Building Code are required, relative to the flood proofing of buildings, to provide municipalities with the mechanisms necessary to implement land use policies within the flood plain.

Therefore, AMO recommends:

XIV That the Building Code be amended to provide for the flood proofing of buildings constructed within a designated flood plain.

3. Other Matters

The Association believes that some of the concerns related to flood plain management have arisen due to a misunderstanding of the terminology used in the present Provincial Government policy. Much of this misunderstanding could be eliminated by the inclusion of a complete "glossary of terms" in the Provincial Government policy when it is issued. This glossary should include those terms defined in the Taylor Committee Report as well as any other terminology used in the policy that may be confusing to the general public. This would include, but would not be limited to, terms such as watershed, channel, channel storage capacity, and 100-year flood.

Therefore, AMO recommends:

XV That a complete and extensive glossary of terms be included as part of the Provincial Government flood plain policy.

The Association encourages the Provincial Government to establish a methodology, complete with rational assumptions, which can be applied consistently across the Province to determine the extent of the flood plain for the 100-year flood. This model must be capable of accommodating the variety of situations which exist throughout the Province relative to topography, the extent of existing and proposed development and the flood prevention and protection measures that may have been implemented.

In this regard the Association believes that the Provincial Government through the Ministry of Natural Resources must provide the funding necessary to research and develop such a model and implement it throughout Ontario. Further in this regard the Provincial Government must continue to provide funding for the implementation of flood control measures and the acquisition of land within the flood plain, where necessary.

Therefore, AMO recommends:

XVI That the Provincial Government, through the Ministry of Natural Resources, provide the necessary funding for research, development and implementation of a methodology to be used to determine the extent of the flood plain that would result from a 100-year flood. This funding must also be available in those areas that have adopted or may wish to adopt a higher regulatory criteria. Where the flood plain is to be redefined it should be done at the initiative of the municipality and funded by the Provincial Government.

XVII That this model be applied consistently, include rational assumptions and be capable of accommodating the variety of situations that exist in watersheds throughout the Province.

XVIII That the Provincial Government at least maintain their current level of funding relative to capital projects for flood protection and control and land acquisition, where necessary within the flood plain.

The Association would also seek the co-operation and assistance of the Provincial Government in conveying to the private mortgage and insurance industries the message that there are varying degrees of risk associated with development within the flood plain. As such, mortgage and insurance companies should recognize the relative degree of risk to properties within the flood plain and accommodate the differences when establishing the applicable rates.

Another question which must be addressed by the Provincial Government prior to the adoption of a flood plain policy is one of the liability associated with the designation of a flood plain, and, the designation of conditional development areas within the flood plain.

Therefore, AMO recommends:

XIX That the Provincial Government address the issues of liability, insurability and the availability of mortgages as they relate to development within the flood plain.

4. Summary of Recommendations

I That the Provincial Government adopt the 100-year flood as the base criteria for the designation of flood plains and for the adoption of official plan policies related to land use within the flood plain.

II That official plans policies based on a flood plain criteria higher than the 100-year flood remain in effect until amended by the municipal council.

III That the option of adopting a flood criteria higher than the 100 year-flood be provided, on a watershed basis, to all watersheds within Ontario.

IV That any proposal to adopt a criteria higher than that established by the Provincial Government be open to public review and subject to an appeal process.

V That the Provincial Government be responsible for establishing a body and a process for the purpose of hearing appeals in this regard and that AMO be provided with an opportunity to review and comment on any such proposals before they are finalized.

VI That the official plan and the official plan process be the mechanisms utilized to determine land use within the flood plain.

VII That fill and construction regulations be subject to public review and appeal.

VIII That all new buildings or structures within the flood plain be required to be designed so as to maintain their structural integrity in the event of a flood with flows up to and including those anticipated during the regulatory flood.

IX That municipalities be responsible for the implementation of flood plain management policies as they relate to the use of land within the flood plain.

X That municipalities be authorized to delegate the responsibility for implementing municipal land use policies within the flood plain to the appropriate conservation authority if they choose to do so.

XI In instances where the municipality retains the responsibility for the implementation of land use policies within the flood plain, the municipality's levy to the conservation authority should be reduced accordingly and any grants related to these activities should be awarded to the municipality.

XII That the use of site plan control in flood plains not be mandatory.

XIII That the Association be consulted with respect to any changes to the Planning Act, 1983, relative to the use of site plan control in the flood plain, prior to the introduction of such changes in the Legislature.

XIV That the Building Code be amended to provide for the flood proofing of buildings constructed within a designated flood plain.

XV That a complete and extensive glossary of terms be included as part of the Provincial Government flood plain policy.

XVI That the Provincial Government, through the Ministry of Natural Resources, provide the necessary funding for research, development and implementaion of a methodology to be used to determine the extent of the flood plain that would result from a 100-year flood. This funding must also be available in those areas that have adopted or may wish to adopt a higher regulatory criteria. Where the flood plain is to be redefined it should be done at the initiative of the municipality and funded by the Provincial Government.

XVII That this model be applied consistently, include rational assumptions and be capable of accommodating the variety of situations that exist in watersheds throughout the Province.

XVIII That the Provincial Government at least maintain their current level of funding relative to capital projects for flood protection and control and land acquisition, where necessary within the flood plain.

XIX That the Provincial Government address the issues of liability, insurability and the availability of mortgages as they relate to development within the flood plain.

Minority Report
submitted by the
County and Regional Section of AMO

The Executive Committee of the County and Regional Section of AMO has supported the AMO Response to the Report of the Flood Plain Review Committee on Flood Plain Management in Ontario with the exception of recommendations #11 and #19.

> "XI In instances where the municipality retains the responsibility for the implementation of land use policies within the flood plain, the municipality's levy to the conservation authority should be reduced accordingly and any grants related to these activities should be awarded to the municipality."

With respect to this recommendation, the County and Regional Section Executive Committee believed that the matter of municipal funding for administrative services would sort itself out through the normal levy procedure. To request that this matter be addressed in a specific fashion would only complicate matters for both the conservation authorities and municipalities.

> "XIX That the Provincial Government address the issues of liability insurability and the availability of mortgages, as they relate to development within the flood plain"

The County and Regional Section Executive Committee did not support the above concerning liability, mortgageability and insurability, believing that these matters could only be addressed with respect to specific cases and only with detailed knowledge of the individual circumstances surrounding any particular case.

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